

LOWENSTEIN SANDLER PC

Attorneys at Law

65 Livingston Avenue

Roseland, New Jersey 07068

(973) 597-2500

Attorneys for Defendant

Prudential Insurance Company of America

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KATHRYN GARCIA, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE COMPANY
OF AMERICA,

Defendant.

Civil Action No. 08-5756 (JAG) (MCA)

STIPULATION AND ORDER

WHEREAS Defendant's response to the Complaint is currently due on
February 2, 2009; and

WHEREAS the parties wish to establish a framework for a briefing schedule
regarding any motion filed in response to Plaintiff's Complaint;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned
counsel for the parties, that:

1. Defendant shall have up to and including March 4, 2009 to file an answer
or responsive motion to Plaintiff's Complaint.

2. If Defendant files a motion in response to the Complaint, Plaintiff's
answering papers in opposition to the motion shall be due on April 3, 2009; and

3. Defendant's reply papers in further support of its motion shall be due on

April 24, 2009.

Lite DePalma Greenberg & Rivas, LLC
Two Gateway Center, 12th Floor
Newark, NJ 07102
Tel.: (973) 623-3000
Attorneys for Plaintiff

Lowenstein Sandler PC
65 Livingston Avenue
Roseland, NJ 07068
Tel: (973) 597-2500
Attorneys for Defendant

By: Bruce D. Greenberg (TM)
Bruce D. Greenberg

By: John R. Middleton, Jr.
John R. Middleton, Jr.

IT IS SO ORDERED:

February 4
Dated: ~~January~~ __, 2009

Hon. Joseph A. Greenaway, U.S.D.J.